

EXHIBIT A

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

Debtor.

UBS SECURITIES LLC and UBS AG LONDON BRANCH,

Plaintiffs,

V.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

Defendant.

Chapter 11

Case No. 19-34054-sgj11

Adversary Proceeding

No. 21-03020-sgj

**DECLARATION OF SARAH TOMKOWIAK IN SUPPORT OF UBS'S OPPOSITION
TO FOREIGN NON-PARTY SENTINEL REINSURANCE, LTD.'S
MOTION FOR PROTECTIVE ORDER**

¹ The last four digits of the Debtor's taxpayer identification number are 6725. The Debtor's headquarters and service address is 300 Crescent Court, Suite 700, Dallas, TX 75201.

I, Sarah Tomkowiak, declare as follows:

1. I am a partner at Latham & Watkins LLP and one of the counsel of record in this case for Plaintiffs UBS Securities LLC and UBS AG London Branch (together, “UBS”). I have personal knowledge of the facts in this Declaration, which I submit in support of *UBS’s Opposition to Foreign Non-Party Sentinel Reinsurance, Ltd.’s Motion for Protective Order*. If called upon to do so, I could and would competently testify to these facts.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a September 2, 2021 email from Jason Burt to Christopher Weldon, counsel for Beecher Carlson Insurance Services LLC (“Beecher”).

3. Attached hereto as **Exhibit 2** is a true and correct copy of UBS’s June 29, 2021 subpoena for the production of documents on Beecher, together with its affidavit of service.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a June 30, 2021 letter from counsel for Brown & Brown, Inc. (“B&B”)—Beecher’s parent company.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a July 13, 2021 letter from counsel for B&B.

6. Attached hereto as **Exhibit 5** is a true and correct copy of two emails dated August 20, 2021, between counsel for UBS and counsel for Sentinel Reinsurance, Ltd. (“Sentinel”).

7. Attached hereto as **Exhibit 6** is a true and correct copy of an August 4, 2021 letter from counsel for Sentinel to counsel for UBS.

8. Attached hereto as **Exhibit 7** is a true and correct copy of an August 20, 2021 email from Beecher’s counsel to UBS’s counsel.

9. Attached hereto as **Exhibit 8** is a true and correct copy of an email exchange dated August 24, 2021, between Beecher’s counsel and UBS’s counsel.

10. Attached hereto as **Exhibit 9** is a true and correct copy of an email chain between Sentinel's counsel and UBS's counsel.

11. Attached hereto as **Exhibit 10** is a true and correct copy of a September 1, 2021 email from Sentinel's counsel to UBS's counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: September 10, 2021

/s/ Sarah Tomkowiak
Sarah Tomkowiak